

CODE OF ETHICS AND COMPANY CONDUCT

Message from the Directors



Our commitment to ethical behaviour and the solid ethical foundations are one of the most essential components of Inclusive Response CIC operation. We are committed to doing business the right way, based on a culture of ethics and compliance.

In the long term, we can successfully face the challenges together by accepting the imperatives of moral responsibility, both as individuals and as a company. In performing the job duties, the employees should always act lawfully, ethically and in the best interests of Inclusive Response CIC and that of the community.

Thank you for upholding our values and helping us do things right. It does it means that ethics and integrity are always born in mind. We only use suppliers who have impeccable human rights and compliance standards, and we ensure that our services are of high integrity for compliance with our Code.

Founders

1. Introduction



This CODE OF ETHICS AND BUSINESS CONDUCT of Inclusive Response CIC serves as our ethical commitment and as a guide to proper business conduct for all of our stakeholders. We, at Inclusive Response CIC are committed to doing business legally, ethically and in a transparent manner.

This document applies to all staff who work for Inclusive Response CIC(including directors, managers, team leaders, employees, temporary, agency, interim, sub-contractor or volunteer staff), and also includes other organisations who do business with us.

Inclusive Response CIC expects its staff to be impartial and honest in all affairs relating to their job. All staff bear a responsibility in general, to be of good faith and do nothing to destroy the trust necessary for employment.

The success of our company is based on the trust we earn from our employees, service users and stakeholders. We gain credibility by adhering to our commitment to fairness and reaching our goals solely through ethical conduct. All staff are expected to adhere to this Code in their professional, as well as personal conduct, treat everyone with respect, honesty and fairness.



Inclusive Response CIC is open to any questions at any time and will not allow punishment or retaliation against anyone for reporting a misconduct in good faith.

Managers and leaders have higher responsibility for demonstrating, also through their actions, the importance of this Code. Managers and leaders are responsible for promptly addressing every raised ethical question or concern. Employees must cooperate in investigations of potential or alleged misconduct.

Non-compliance to this Code is considered as misconduct that could warrant disciplinary action, including termination of employment or other contract in deserving cases.

We are committed to making efforts to apply our values and norms also throughout the entire value chain of our own suppliers, sub-contractors, service providers and business partners.

2. Ethical Principles



Our core values at Inclusive Response CIC are:

Honesty • Integrity • Trustworthiness • Respect for others • Responsibility • Accountability
• Reliability • Obedience to the law

3. Ethical Decision-making

Ethical conduct is value-driven decision-making. Several key questions can help to identify situations that may be unethical, inappropriate or illegal. Ask yourself:



Is what I am doing legal? • Does it reflect our company values and ethics? • Does it comply with the Code and company policies? • Does it respect the rights of others? • Is this the right thing to do? • Have I been asked to misrepresent information or deviate from normal procedure?

4. Compliance with laws and regulations



Our commitment to integrity begins with complying with laws, rules and regulations. We understand and comply with the legal requirements and commercial practices of lawful business.

We are committed to adhere to every valid and binding contractual agreement that we conclude, and we do not abuse our rights.

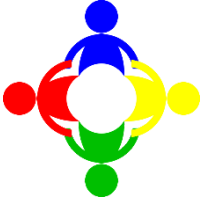
Our staff must follow applicable laws and regulations, including the Code at all times and must ensure compliant operation. All staff must follow company policies.

5. Sustainability: People + Planet



We are committed to meet current requirements without compromising the needs of future generations. To this, we combine environmental and social factors in our operation and our company decisions.

6. Human rights



We are committed to respect human dignity and rights of each individual and community whom we interact with during the course of work. We shall not, in any way, cause or contribute to the violation of human rights. Our staff shall treat everybody with dignity, respect and care and uphold human rights.

7. Fair labour practices and working conditions



We are committed to promote equality in our employment practices and to fair employment in compliance with applicable policies. We are firmly opposed to employ or contract child or slave labour or any form of forced or compulsory or bonded labour. We condemn all forms of illegal, unfair, unethical labour practice that exploits the workforce, destroys social security or serves as tax evasion.

Our staff shall act with integrity and treat their colleagues and others through the work with full respect.

8. Discrimination and harassment



We provide equal opportunity in employment and we do not tolerate any discrimination or harassment or any type from abuse. No direct or indirect discrimination shall take place based on any professionally non-relevant trait or circumstance, like gender, marital status, age, national or social or ethnic origin, colour, religion and political opinion, disability, sexual orientation, employee representation, property, birth or other status. Any kind of discriminatory behaviour, harassment, bullying or victimization is prohibited.

All staff are expected to follow the highest standards of conduct in all verbal and written communication based on mutual respect, and must refrain from any form of harassment, slander or any behaviour that could be taken as offensive, intimidating, humiliating, malicious or insulting.

9. Health, Safety and Environment



We provide clean, safe and healthy work conditions and we are dedicated to maintaining a healthy environment. We are committed to minimise the impact on the natural environment of our operations. We make efforts to reduce the use of finite resources, like energy or water, and the harmful emissions, like waste.

All staff must follow and comply with every relevant health, safety and environmental protection laws, regulations and rules all times.

10. Fair competition and business conduct



Our relationships with business partners are built upon trust and mutual benefits.

We refrain from damaging competition and the reputation of any business partners and any behaviour that harms competitor's credibility.

We do not hold back maliciously, unlawfully or unduly payments towards our partners, and we do not allow such practices in our supply chain.

11. Anti-corruption



We firmly condemn and do not tolerate all forms of corruption. It is prohibited directly or indirectly offering, promising, giving, asking, soliciting or accepting any unfair advantage or benefit, in order to obtain, retain or facilitate in any way the company. An unfair advantage or benefit may include cash, any cash equivalent (e.g. voucher), gift, credit, discount, travel, personal advantage, accommodation or services. We do not permit facilitation (or "grease") payments to government officials or private business in order to secure or speed up routine actions. Corruption also covers the misuse of function or position as well, when someone makes that false appearance that improperly influences a decision maker.

Corruption is considered gross misconduct. Similarly accepting or allowing another person to accept a bribe is considered gross misconduct. Our staff has to account for all benefits received in the course of doing business and must not give or receive bribes or otherwise act corruptly.

12. Gifts and Hospitality



We shall avoid any actions that create a perception that favourable treatment was sought.

13. Security, protection and proper use of company assets



We are responsible for the security, protection and for the economic use of company resources. Our resources, including time, material, equipment and information are provided for legitimate business use only. Occasional personal use is permissible as long as it is lawful, does not affect job performance or disrupts workplace morale.

All staff are obliged to follow appropriate security measures and they should treat company property, whether material or intangible, with respect and shouldn't misuse company assets or use it carelessly.

14. Confidentiality, information security, proprietary information and intellectual property



We are committed to company information confidentiality, integrity and accessibility, we implement proper security measures and it is our staff's obligation to uphold this. Proprietary information includes all non-public information that might be harmful to the company or its service users, business partners if disclosed to unauthorised parties

We respect the property rights of others. We will not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means. We will not engage in unauthorised use, copying, distribution or alteration of software or other protected intellectual property.

15. Bookkeeping, true reporting and financial integrity



Our books, records, accounts and financial statements must be maintained in appropriate detail, and must truly and properly reflect our transactions. We condemn all forms of money laundering, so we are committed to do business with partners involved in legitimate business activities with funds derived from legitimate sources.

We commit ourselves to fair taxation and to avoid all tax evasion practices, including such as failing to issue receipts or accounting fake expense invoices.

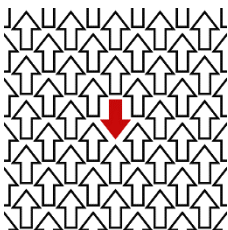
All staff must follow accounting procedures, ensure that business transactions are recorded and documented appropriately and make certain that all disclosures made in financial reports are full, honest, accurate, timely and understandable. All staff must not improperly influence, manipulate or mislead any audit.

16. Anti-Fraud



Fraud – the act or intent to cheat, steal, deceive or lie – is both unethical and, in most cases, criminal. Fraud in every form, (including e.g. submitting false expense reports; forging or altering financial documents or certifications; misappropriation of assets or misusing company property; making any untrue financial or non-financial entry on records or statements) is prohibited.

17. Conflict of Interests



A "conflict of interest" exists when an employee's personal interest (that can be linked to e.g. friends, family, or service user, competitor, supplier, contractor entity, as well) interferes or potentially interferes with the best interests of Inclusive Response CIC. Determining whether a conflict of interest exists is not always easy to do, thus anyone with a conflict of interest question should seek advice from management.

Conflicts of interest could arise:

- Being employed (you or a close family member) by, or being in economic relation with an actual or potential service user, competitor, supplier or contractor.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for another company or organisation.
- Owning or having a substantial interest in a service user, competitor, supplier or contractor.

- Having a personal interest, financial interest or potential personal gain in any company transaction.

If co-workers become involved in personal relations with each other, the onus is on the senior employee concerned to bring this to the attention of their manager to confirm that there is no conflict of interest, nor will a conflict of interest arise.

18. Privacy, personal data protection



We respect people's privacy and we acknowledge service users, employees and other natural persons' need to feel confident that their personal data is processed appropriately and for a legitimate business purpose. We are committed to comply with all personal data protection laws. We only acquire and keep personal information that is necessary and we give proper information on these activities to data owners. We

implement proper security measures to assure confidentiality, integrity and availability of personal information.

Our staff must observe the legal requirements, apply compliant practices and follow related procedures to ensure legality of personal data handling and processing activities.